

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V Permit No. V-02-042 R1

COX INTERIOR, INC.

Campbellsville, KY.

April 4, 2006

ESMAIL HASSANPOUR, REVIEWER

SOURCE ID #: 21-217-00027

SOURCE AI #: 4001

ACTIVITY ID #: APE20050004

CURRENT PERMITTING ACTION: MINOR PERMIT V-02-042 R1

An application for a minor revision to Permit V-02-042 was received from Cox Interior, Inc. on May 19, 2005. The request was for an increase in the maximum operating limitations for Emission Unit 03, Surface Coating Operation, since the associated substance 2-Butoxyethanol (EGBE) CAS#111-76-2 has been delisted from the Hazardous Air Pollutant category (Letter submitted May 19, 2005). The source also requested to delete emission unit 04, 9.572 mmBtu/hr Wood-fired Indirect Heat Exchanger from their Title V permit, because it has been decommissioned (Letter submitted February 8, 2006).

This permit also incorporates off-permit and 502 (b) (10) changes, which Cox Interior, Inc. has undertaken since the original Title V permit was issued (Letters Submitted, August 3, 2005, February 23, 2006, and March 8, 2006).

PAST PERMITTING ACTION: INITIAL SOURCEWIDE PERMIT V-02-042

A TV operating permit application was received from Cox Interior, Inc. on December 10, 1998. The application was deemed administratively complete on February 01, 1999. The facility currently operates under permit numbers 0-90-015, C-93-154, S-94-123, S-96-036, S-96-244, S-98-007, and F-96-02 (Revision 1). Cox Interior, Inc. is an existing source with wood handling system, surface coating, indirect heat exchangers and millwork facilities and makes wood products in Taylor County, Kentucky. The plant processes lumber, which are inspected to determine grade and then dried in a kiln. The dried lumber is taken to the planer operation for both sides to be surfaced. From this operation, eight inch and wider boards are separated as clear and common grade and pulled into stacks. Clear boards are either taken to the glue room or processed through the moulder. Common boards are sent to the chopsaw department to be crosscut into several parts. These parts are then distributed to the Finger Joint department, Glue department, or the Moulders.

Finger jointed boards are separated into two grades, clear and gang-rip, and stacked accordingly. The clear boards are taken to the moulders and processed into several patterns and the gang-rip boards are taken to a rip saw to be sized and processed through the glue room, rip saw, planer and moulder.

The glue department either face or edge glues boards, which are then sent to either the door department for door parts, woodmont for stair parts, arch department for arches, or special mill for mantels, circular stairs, and other custom patterns.

The moulder department processes board into 150 stock and custom patterns. The finger jointed moulded patterns are transferred to the priming department and the clear moulded patterns are transferred to the warehouse, placed in inventory, and shipped. Doors, stair parts, and some custom parts would also go the priming department.

Other finished parts are wrapped and/or boxed and transferred to shipping.

Wood waste is transferred to handling, processing, and storage facilities, which consist of baghouses, cyclones, duct work, designated buildings, tractor trailers, sawdust shakers, augers, balers, and storage silos. These facilities prepare and store the waste for use as fuel in the indirect heat exchangers or as animal bedding product.

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| E. Unit 01: | Millwork operation: Dimensioning department, stair department and door department: |
| louver | Planers, rip saws, chop saws, sanders, drills, finger joint machines, optimizers, moulders, buffers, jointers, lathes, routers, mitre saws, curving machines, groovers, shapers, teennoners, grinders, fluting and twist machines, Norfield, and RUVO door machines, band saws, door presses, sawbucks, radial arm saws, ski |
| KVAL | |
| saws, ski | saws, double end trim saws, baghouses and enclosures. |
| | |
| E. Unit 02 | Wood waste handling, storage and processing: Storage buildings, silos, trailers, baghouses, 2 cyclones, augurs, shakers, balers and enclosures. |
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| E. Unit 03 | Surface coating: moulding machines, spray booths, drying ovens, filter chambers. |
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| E. Unit 05 | 10.0452 mmBtu/hr Horizontally-opposed- clean #2-oil-fired indirect-heat-exchanger. |
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| E. Unit 06 | 61.4 mmBtu/hr Stoker wood-fired indirect-heat-exchanger with enclosures and dust collection system from Emission Unit 01. Secondary fuel is straw bedding. |
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| E. Unit 07 | 61.4 mmBtu/hr Stoker wood-fired indirect-heat-exchanger with fly ash reinjection, enclosures and dust collection system from Emission Unit 01. Secondary fuel is straw bedding. |

REGULATION APPLICABILITY:

401 KAR 59:010, new process operation.

401 KAR 59:015, new indirect heat exchangers.

401 KAR 63:010, fugitive emissions.

401 KAR 63:020, Potentially hazardous matter and toxic substances.

Please see details in the permit.

COMMENTS:

The three hour averaging time associated with the particulate matter mass emission standards for emissions units 01, 02 and 03 are applicable during compliance demonstration when performance tests are required by the Division.

The permittee may ensure compliance with the emissions limitations and standards conditioned within the permit for Emissions Units 05, 06 and 07 by performing the calculations based upon sulfur content, fuel usage and processing rates, and emission factor information. Additionally, the permittee is required to monitor the fuel consumption rates, processing rates, and operation of the unit's control equipment used to control emissions.

Emission units 05, 06, and 07 were constructed at another plant before June 9, 1989. Attached is a letter from U.S. Region IV clarifying the inapplicability of the Federal Regulation 40 CFR 60, subpart Dc.

EMISSION AND OPERATING CAPS DESCRIPTION:

Sourcewide VOC emissions shall not equal or exceed 45 tons per year, and Hazardous Air Pollutant (HAP) emissions shall not equal or exceed 9 tons per year of a single HAP nor 22.5 tons per year of any combination of HAPs to preclude the applicability of 40 CFR 63, Subpart QQQQ, National Emission Standard for Hazardous Air Pollutants: Surface coating of wood building products and 40 CFR 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Process Heaters.

PERIODIC MONITORING:

None

OPERATIONAL FLEXIBILITY:

None

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.